

# LAW OFFICES OF JEAN M. KIES, S.C.

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Tuesday, March 26, 2013

Hon. Lynn Adelman  
United States District Court  
517 East Wisconsin Avenue  
Milwaukee, Wisconsin 53202

Re: *United States v. Sean D. Patrick*  
2:11-cr-238-LA

Dear Judge Adelman:

In reviewing the filed documents in this case, I discovered that Doc. 20, a letter from ADA Sara Beth Lewis, is an unsigned draft. I am attaching a signed copy of that letter for your review.

ADA Lewis refers to the trial of Mario Harris, 2011CF2966, wherein Mr. Patrick (and the undersigned!) testified on February 20, 2012. What is not revealed in the case record, or in ADA Lewis's letter, is that Mr. Patrick had been asked, and then threatened, to provide false testimony - which he declined to do. See attached report of Det. Thomas Dineen.

Kindly include this information in your determination of the substantial assistance given by Mr. Patrick.

Yours very truly,

/s/

Lew A. Wasserman 1019200

attachments

CC: ECF filers.



OFFICE OF THE DISTRICT ATTORNEY  
*Milwaukee County*

JOHN T. CHISHOLM • District Attorney

Chief Deputy Kent L. Lovern, Deputies James J. Martin, Patrick J. Kenney, Lovell Johnson, Jr., Jeffrey J. Altenburg

March 29, 2012

AUSA Joseph R. Wall  
US Attorneys Office Eastern District  
517 E Wisconsin Ave Rm 530  
Milwaukee, WI 53202-4509

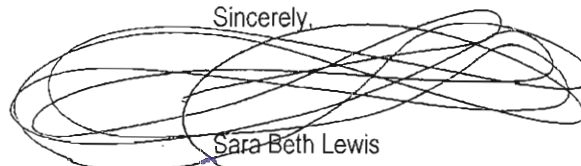
Re: **Sean Patrick: Cooperation in State Prosecution**

Dear AUSA Wall:

I am writing to inform you that the above named federal defendant, Sean Patrick, provided meaningful cooperation in the State prosecution of defendant Mario Harris. Mr. Harris was convicted at trial of nine felony offenses, including Trafficking of a Child, Soliciting a Child for Prostitution, Pimping and Pandering and Soliciting Prostitutes, among other charges.

Mr. Patrick assisted in the prosecution of Mr. Harris by providing detailed and credible testimony at the trial of Mr. Harris. Mr. Patrick's testimony was probative and most probably relied upon by the jury in reaching their verdicts. I consider Mr. Patrick's cooperation in this matter to have been meaningful and significant.

Sincerely,

  
Sara Beth Lewis  
Assistant District Attorney

CC: Lewis Wasserman (Attorney for Sean Patrick)

Donald S. Jackson  
Gale G. Shelton  
Gary D. Mahkorn  
David Rootes  
Cynthia G. Brown  
Norman A. Gahn  
Steven H. Glamm  
Mark S. Williams  
John M. Stoiber  
Thomas L. Potter  
David Feiss  
Rayann Chandler Szydlinski  
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Kenneth R. Berg  
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Anthony White  
Antoni Apollio  
Nicole D. Loeb  
Elin Karshen  
Lucy Kronforst  
Michael J. Lonski  
Paul M. Hauer  
Sara Beth Lewis  
Jenni Spies  
David M. Stegall  
Amanda Kirklevski  
Benjamin Wasson  
Renee Helnitz  
Karl P. Hayes  
Holly L. Bunch  
Jacob A. Marian  
Heather M. Placek  
Megan M. Williamson  
Dewey B. Martin  
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Kimberly D. Schoepp  
Nicole J. Sheldon  
Dax C. Odom  
Maureen A. Atwell  
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Antonells Schildgen  
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Kristen Reddinger  
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William M. Levins  
Matthew R. Westphal  
Caitlin A. Ringersma  
Sara Volden Schroeder  
Abbey Marzick

# MILWAUKEE POLICE DEPARTMENT

## MEMORANDUM

Date: 02-20-2012

TO: Captain James Shepard

FR: Detective Dawn Jones

CC:

RE: Interview of Dwayne P. Thomas (b/m 08/22/1986)



This report was written by Det. Thomas Dineen, assigned to the Sensitive Crimes Division, early power shift.

On Monday, February 20, 2012, at approximately 1:50pm, Detective Dawn Jones and myself had the opportunity to speak with Dwayne P. Thomas (b/m 08/22/1986) regarding information that we received that he had relayed a message from Mario Harris to Sean Patrick at the request of Mario Harris.

Upon speaking with Thomas he stated that he knew Harris from a prior incarceration with him. Thomas further stated that he knew Patrick from being incarcerated with him up north. Last Wednesday (02/15/2012) Thomas and Harris were in court staging together. Harris told Thomas that Sean Patrick was coming down to testify in his trial. Thomas stated that later that night he seen Patrick at the county jail. On Friday (02/17/2012) Thomas was again in court staging with Harris. Thomas told Harris that he had seen Patrick. Harris told Thomas to give Patrick a message from him. Thomas said that Harris told him to tell Patrick to keep it 100 and to keep it real. Thomas said that Harris told him that Patrick knows what that means and that Patrick will know exactly what to do.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read 'Det. Thomas Dineen', is written over a horizontal line.

Det. Thomas Dineen